

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION**

MICHAEL CHAVARRIA, et al.,

Plaintiffs,

V.

CATAVOY COTTON GIN, LLC, et al.,

Defendants.

CIVIL ACTION NO. 01:10-cv-01526

Judge Dee D. Drell

Magistrate Judge Kirk

## **PROPOSED PLAN OF WORK**

On May 9, 2011, the following individuals participated in a meeting by telephone during which this Plan of Work was formulated:

Melody Fowler-Green  
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J.W.Seibert, III  
Attorney for Defendant Catavoy Cotton Gin, LLC  
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Philip A. LeTard, Sr.  
Attorney for Defendant Roger Johnson  
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## PART A

Based on the information now reasonably available, the parties have agreed upon the following:

- |                              |                                           |
|------------------------------|-------------------------------------------|
| 1. <u>November 18, 2011</u>  | Deadline for completion of discovery      |
| 2. <u>December 19, 2011</u>  | Final date for filing dispositive motions |
| 3. <u>August 19, 2011</u>    | Final date for adding parties             |
| 4. <u>September 19, 2011</u> | Final date for filing amended pleadings   |
| 5. <u>July 19, 2011</u>      | Final date for employing experts          |

6. September 19, 2011 Final date for exchanging reports of experts
7. November 18, 2011 Final date for taking depositions of experts
8. May 30, 2011 Date disclosures under Fed. R. Civ. P. 26(a) were made or will be made

9. Considering the subjects addressed by Fed. R. Civ. P. 26(f), the parties propose the following changes, limitations, or other matters:

No changes need be made. The parties do not consent to trial by the magistrate.

## **PART B**

The following areas of disagreement, issues, or problems have arisen regarding the information set forth in Section A and/or the participation of counsel/unrepresented parties in the Plan of Work process:

The parties agree to work together to arrange mutually agreeable times and locations for depositions of Plaintiffs, taking into account the fact that they reside permanently in South Texas and are migrant workers.

Respectfully Submitted,

**/s/ Melody Fowler-Green**

Melody Fowler-Green  
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